

Environment, Safety and Health and National Environmental Policy Act Procurement Review

INTRODUCTION

Purpose and Scope

The purpose of this policy is to establish required review processes intended to identify risks to the worker, the environment or the project, and to comply with the requirements of [FESHM 8060](#) National Environmental Policy Act (NEPA), the Fermilab ProCard User's Guide and meet the objectives of [FESHM Chapter 8022](#) Waste Minimization and Pollution Prevention Awareness Program.

RESPONSIBILITIES

Divisions/Sections

1. Division/Section Heads shall identify individuals deemed qualified by training, education and/or experience to perform the review process.
2. ES&H Group Leaders shall ensure that each designated reviewer satisfactorily completes any applicable training requirements outlined in [FESHM Chapter 8060](#) and the Fermilab ProCard User's Guide.
3. Develop a Division/Section specific written implementation procedure. See the attached Technical Division Policy 4100 for guidance.

PROCEDURES

All FNAL purchase requisitions, including user requisitions, electronic requisitions, work orders and acquisitions from government excess shall be reviewed for ES&H and NEPA significance at the division/section level for environment, safety and health concerns by trained personnel.

ProCard purchases are for the purchase of supplies and/or services and need to be reviewed for ES&H sensitive items per the requirements outlined in the Fermilab ProCard User's Guide.

Requisitions for radioactive sources or for any form of radioactive materials must be reviewed by the ES&H Section in accordance with Fermilab's Radiation Control Manual Procedures Part 3, Section 432.

Training

Training on the requirements of this chapter and in reviewing actions for ES&H concerns is the responsibility of division/section ES&H groups.

Training in NEPA review procedures is the responsibility of the ES&H Section, however, not every action requires a NEPA review (see FESHM 8060 for NEPA procedures). Completion of course FN000194-CR - NEPA REVIEW TRAINING satisfies the NEPA training requirement. Re-training is required yearly. Registration can be made on the web using the TRAIN database found in the ES&H Section home page.

The Business Services Section shall provide training to ProCard holders in accordance with Fermilab's ProCard Users Manual. Divisions/Sections may provide additional training to their ProCard holders as may be required.



Fermilab

TECHNICAL DIVISION
POLICY 4100

ES&H AND NEPA
PROCUREMENT REVIEW

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1.0 Purpose and Scope

The purpose of this policy is to implement a review process intended to identify potential risks to the worker, the environment or the project, and to comply with the requirements of FESHM Chapters 5010 and 8060, and meet the objectives of FESHM Chapter 8022. The Technical Division therefore requires the review of all procurement actions for environment, safety and health (ES&H), National Environmental Policy Act (NEPA) impact, and waste minimization and pollution prevention considerations before being forwarded to the Procurement Department. Procurement actions include material and/or equipment acquired from government excess.

All purchase requisitions, Procard purchases, task orders, short orders and acquisitions from government excess for activity within the Technical Division must be reviewed for ES&H and NEPA significance before any commitment by the Technical Division. Trained individuals in the TD ES&H Group and the TD Material Control Department (MCD) will perform this review process following the procedures in this policy. Procurement documents must contain sufficient detail and clarity to allow the reviewer to understand the proposed action and to identify all proposed materials, uses and/or installation methods.

2.0 Procedures

2.1 Division Responsibilities

- 2.1.1 The Division Head will identify individuals within the Division deemed qualified by training, education and/or experience to perform the review process.
- 2.1.2 The ES&H Group Leader will ensure that each designated reviewer satisfactorily completes the training required by FESHM Chapters 5010 and 8060.

2.2 Requestor Responsibilities.

- 2.2.1 The requestor must attach all necessary information to the procurement request document to allow the reviewer to understand the extent of the proposed actions. The On-Site Service Subcontractor Specification Checklist must be attached to all requisitions for service subcontractor activities.
- 2.2.2 A written description must be included to support any identification numbers, part numbers, catalog numbers, etc., to fully identify the material(s) being proposed for procurement or acquisition from government excess.
- 2.2.3 Any applicable code or standard requirement, warranty, inspection, testing or acceptance process required as a part of the action must be clearly stated. For example, "Lifting fixture must be manufactured according to ANSI B30.20".
- 2.2.4 Any special requirements for access to the work area, such as off-hours work, must be stated on the procurement request document.
- 2.2.5 Laboratory specific ES&H training requirements must be clearly stated on the procurement document(s).
- 2.2.6 The procurement documents must be delivered to the Material Control Department to begin the review process.
- 2.3 Procurement Purchases
- 2.3.1 The following types of procurements are considered ES&H sensitive, and Procard requestors must obtain the approval of a TD ES&H Group reviewer **before** placing the first time order of one of these items:
- Chemicals (See 2.3.2)
 - Paints
 - Personal protective equipment
 - ES&H-related training seminars
 - Scaffolding equipment
 - Forklift equipment
 - Fire protection/detection/suppression systems
 - Subcontractor work in hazardous locations, such as: ODH, radiation areas, confined spaces, etc.
 - Building modifications, maintenance or construction activities.
 - Chemical spill control equipment
 - Lifting fixtures and devices
 - Pressure/vacuum vessels
 - Storage tanks
 - Acquisitions from government excess
- 2.3.2 Chemicals purchased with a Procard must be shipped direct from the vendor to the laboratory in compliance with Department of Transportation (DOT) regulations. The Procard holder must inform the vendor to label the package "Contains Chemicals" on the shipping address label, in addition to any other DOT required labeling and markings. **A Material Safety Data Sheet (MSDS) must be provided to the ES&H reviewer before any chemicals are purchased with a Procard.** The vendor should also

be requested to include a MSDS with the package. The package labeling and MSDS will assist the Shipping and Receiving Department in handling the material properly.

2.4 Material Control Department.

- 2.4.1 The TD Material Control Department Head will identify individuals for participation in the review process to the Division Head.
- 2.4.2 Individuals within the MCD who have been selected to perform reviews will be provided training by a qualified individual from the TD ES&H Group.
- 2.4.3 All purchase requisitions, task orders, short order forms and government excess acquisitions must be collected at the TD MCD requisition tracking desk in preparation for review.
- 2.4.4 Procurement documents will be examined to understand the type of material or service requested. The documents describing items from the MCD pre-qualified list may be stamped and initialed to indicate ES&H review, and then returned to the TD signature chain.
- 2.4.5 When questions or uncertainties arise regarding the procurement action, the procurement document must be forwarded to a TD ES&H Group reviewer.
- 2.4.6 Procurement actions that do not meet items on the pre-qualified list must be forwarded to a TD ES&H Group reviewer.

2.5 Pre-Qualified List

- 2.5.1 Certain procurement actions have been determined by the TD ES&H Group to have no ES&H or NEPA impact. These items are listed on the pre-qualified items list. If all materials and actions associated with a procurement activity are found on the pre-qualified list, then the procurement is exempt from further review. If any portion of the procurement activity does not appear on the pre-qualified list, the entire document must be forwarded to the TD ES&H Group for additional review.
- 2.5.2 The following items may receive an ES&H review stamp and be initialed by the TD MCD reviewers:
 - The purchase of these supplies and equipment where no installation or service is included:
 - a) Computer hardware
 - b) Computer software
 - c) Office equipment
 - d) Office supplies (excludes adhesives, liquids or lubricants)
 - e) Subscriptions or publications
 - f) Production aids (excludes adhesives, liquids or lubricants)
 - Purchase of materials in the base form where no machining, installation or labor of any kind is included:
 - a) Aluminum stock
 - b) Brass stock
 - c) Copper stock

- d) Steel stock
- e) G-10 or G-11 stock
- Fabrication of materials by the TD Machine Shop, fabrication requisitions for Purchasing or MCD task order shops (component and sub-assembly level only):
 - a) Adjust the cost
 - b) Adjust the budget code
 - c) Adjust the drawing revision identifier
- Other items deemed appropriate by the ES&H Section.

Note: Procurement revisions that include a change of materials, installation, and assembly method or work location may not be stamped by the MCD reviewer unless the change is included in the pre-qualified list.

2.6 ES&H Group

- 2.6.1 Training. Individuals within the TD ES&H Group who have been selected by the Division Head to perform reviews will receive the training specified in FESHM Chapters 5010 and 8060. The qualified reviewers within the ES&H Group will in turn provide training and support to the individuals within the MCD selected to perform reviews, and to all Procard holders within TD.
- 2.6.2 Pre-Qualification of Materials. The TD ES&H Group will perform an initial review of common TD procurement actions and will then generate a list of those actions that have no potential ES&H and/or NEPA impact. The Pre-Qualified Items List must be periodically reviewed and updated to reflect current Division activities.
- 2.6.3 Procurement Reviews. Designated ES&H Group reviewers will make themselves available to review procurement documents. The review of each procurement document must include at a minimum the consideration of the following concerns:
- NEPA impact according to the requirements of FESHM Chapter 8060.
 - ES&H impact according to the requirements of FESHM Chapter 5010.
 - Waste minimization and pollution prevention objectives according to FESHM Chapter 8022.

Procurement actions that do not have potential ES&H impact will be stamped and initialed. The reviewer will address potential NEPA impact by entering their ID number and indicating on the line following "CX" with either "Yes", "N/A" or "No" as appropriate. Any procurement action marked as "CX – No" must be forwarded to the TD ES&H Group Leader for the preparation of a Project Information Form (PIF). Any concerns must be adequately addressed before the document can be stamped and initialed by the reviewer. Once stamped, the procurement action is returned to the signature chain.

- 2.7 Procurement Review Process Flow Chart. A flowchart to aid in following the procurement review process in the Technical Division is included at the end of this policy. The procurement process on the chart starts at either "*Requestor Generates Procurement Document*" or "*Procard Purchase*" in the ovals at the top of the page. "Procurement" on the flow chart includes acquisitions from government excess.

